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August 8, 2025

VIA ELECTRONIC COURT FILING and
VIA UPS OVERNIGHT MAIL

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Honorable Sanket J. Bulsara
United States District Court
Eastern District of New York
100 Federal Plaza
Courtroom 930
Central Islip, NY 11722

Re: AA Medical, P.C. v. Iron Workers Local 40, 361 & 417 Health Fund
Civil Action No.: 22-CV-01249 (SJB)(LGD)

Dear Judge Bulsara:

This firm is counsel to Defendant, Iron Workers Local 40, 361 & 417 Health Fund, regarding the above referenced matter.

As per your motion bundle rules, enclosed please find courtesy copies of the following:

- 1) Defendant's Notice of Motion for Summary Judgment;
- 2) Defendant's Declaration of Thomas P. Keane, Esq. in Support of Motion for Summary Judgment with Exhibits;
- 3) Defendant's Affidavit of Brian Sabbagh in Support of Motion for Summary Judgment with Exhibits;
- 4) Defendant's Memorandum of Law in Support of Motion for Summary Judgment.
- 5) Defendant's Rule 56.1 Statement of Undisputed Material Facts;
- 6) Defendant's Affidavit of Service dated May 9, 2025;
- 7) Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment dated June 27, 2025;
- 8) Plaintiff's Response to Defendant's Rule 56.1 Statement of Undisputed Material Facts and Counterstatement of Material Facts dated June 27, 2025;
- 9) Plaintiff's Affirmation of Dimitri Teresh, Esquire in Opposition to Defendants' Motion for Summary Judgment;
- 10) Defendant's Reply Memorandum of Law in Further Support of its Motion for Summary Judgment dated August 8, 2025; and
- 11) Defendant's Affidavit of Service dated August 8, 2025.

Also, please be aware that the motion documents listed above are exact copies of the electronically filed documents that were uploaded to the Court's ECF system this date.

Thank you for your time and attention to this matter.

Respectfully,

COLLERAN, O'HARA & MILLS L.L.P.

By: /s/ Thoms P. Keane
THOMAS P. KEANE

cc: Ryan Milun, via Overnight Mail & ECF
Dimitri Teresh via Overnight Mail & ECF

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